

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
LARRY PIONE,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 04-12177-MLW
)	
THE MASSACHUSETTS PORT)	
AUTHORITY,)	
)	
Defendant.)	
_____)	

AFFIDAVIT OF WILLIAM V. HOCH IN SUPPORT OF
DEFENDANT'S MOTION TO DISMISS

I, William V. Hoch, do hereby depose and state as follows:

1. I am employed as Senior Employment Counsel by the Massachusetts Port Authority. I have held this position since May of 2004.
2. Attached to this Affidavit as Exhibit A, you will find a true and accurate copy of the Massachusetts Port Authority's Policy on Employment Terms and Conditions dated September 21, 2000. This policy was in effect during the time period relevant to this action.
3. Attached to this Affidavit as Exhibit B are true and accurate reproductions of pages from Larry Pione's first day of deposition in the matter of *Larry Pione v. Massachusetts Port Authority*, MCAD Docket No. 02-BEM-02528.

4. Attached to this Affidavit as Exhibit C are true and accurate reproductions of pages from Larry Pione's second day of deposition in the matter of *Larry Pione v. Massachusetts Port Authority*, MCAD Docket No. 02-BEM-02528.

SIGNED THIS 14th DAY OF JANUARY 2005, UNDER THE PENALTIES OF PERJURY.

/s/ William V. Hoch

William V. Hoch

CERTIFICATE OF SERVICE

I, William V. Hoch, hereby certify that I caused to be served one copy of the foregoing Affidavit of William V. Hoch in Support of Defendant's Motion to Dismiss on counsel for the plaintiff on this 14th day of January, 2005 by mail as follows:

Elise A. Brassil, Esquire
Sarrouf, Tarricone & Flemming
95 Commercial Wharf
Boston, Massachusetts 02110

/s/ William V. Hoch

William V. Hoch